

Response to FEC Letter of Dec. 17, 2008, Requesting Additional Information (Reference: 12 Day Pre-General Report, 10/1/2008 - 10/15/2008)

Item 1. The memo entries on Schedule A supporting Line 11(a)(i) provide the disclosure required by 11 CFR 102.17(c)(8) to itemize the Republican Party of Virginia's (RPV) share of gross receipts from joint fundraising. Schedule A, Line 12 entry on page 22 of the Report show receipt of funds of \$40,460.67 on 10/8/2008 as a transfer from joint fundraising representative (JFR), the Gilmore Victory Committee. The Schedule A, Line 11(a) memo entries totaling \$48,100 itemize the gross receipts associated with this transfer. As can be seen in the "Subtotal of Receipts" at the bottom of each page of Schedule A, the amounts of these memo entries are not included in total receipts. The \$7,639.33 difference between the total memo entries amount and the total JFR transfer amount represents the RPV's share of expenses incurred and reported by the Gilmore Victory Committee.

Item 2. The RPV uses the following "best efforts" procedures for obtaining full name, mailing address, occupation and name of employer for each contributor:

- 1 - The RPV requests the required information in all solicitation materials and includes on any response material in a solicitation a statement of law, using one of the examples of acceptable statements set forth in 11 CFR 104.7(b)(1), informing the contributor of the requirements of federal law for reporting such information;
- 2 - Within 30 days of receiving a contribution that exceeds the \$200 threshold, but for which all required information is not provided, an attempt is made to contact the contributor by telephone or email communication to request the missing information, if the contributor's phone number or email address is on file;
- 3 - If the above mentioned telephone or email communication to the contributor does not yield the missing information, or if the contributor's telephone number and email address cannot be obtained, a letter is mailed promptly to the contributor, explaining the disclosure requirements of federal law, requesting the missing information and not making an additional solicitation;
- 4 - If the contributor does not respond to a follow-up request, the RPV uses information, if available, in its contributor records, fundraising records or prior reports when disclosing the contribution.

When missing information on a contributor is subsequently obtained, that information is reported. For the Pre-General Report at issue, information for contributors Mary J. Gulino and Arthur G. Randol III has been updated in the amended report. The following donors have not responded to request letters: Andrew Dickinson and Virginia C. Ward.

Item 3. With regard to the contributors listed below whose information on "Employer and/or Occupation" you have determined to be inadequately identified, this is the information provided by each individual contributor. The RPV has sent a follow-up request letter to each of these contributors asking for clarification of the required information. When clarification on this information is received from a contributor, the RPV will report that information.

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| 1 - Andrew Dickinson | Emory Univ./Requested |
| 2 - Anthony J. LaCava | US Govt/Security |
| 3 - Roland R. Parris Jr. | Self/Sales |

Item 4. To ensure that no national party committee funds are used to pay for Exempt Party Activities, the RPV maintains a separate Transfer Account into which it deposited the 10/17/2008 transfer from the Republican National Committee in the amount of \$102,000. The RPV subsequently used those RNC transferred funds to pay for postage for a generic get-out-the-vote absentee ballot application mailing by a disbursement from the Transfer Account to King Strategic Communications on 10/7/2008 that is disclosed on RPV's 2008 Pre-General Report. We are amending our Pre-General Report to provide the correct description of this disbursement as being for "Generic GOTV AB mailer postage" and to report this disbursement on Line 21(b).

The RPV made its Exempt Party Activity disbursements for signs, door hangers, palm cards, bumper stickers, postage for mailers and campaign mailers from a separate Victory Account containing permissible federal funds and in one case (a 10/14/2008 disbursement to Printing Express for campaign signs) from the RPV's Federal Operating Account which also contains permissible federal funds. No national party committee funds were used to pay for these campaign signs, door

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hangers, palm cards, bumper stickers, postage for mailers and campaign mailers. these disbursements for signs, door hangers, palm cards, bumper stickers, postage for mailers and campaign mailers represent volunteer activity that meets the definition of Exempt Party Activity as set forth in 11 CFR 100.87 and 100.147.

Item 5. Individual contributors listed on Schedule A whose Aggregate Year-to-Date contributions totals were omitted are those contributors from joint fundraising reported as memo entries as described in Item 1 above. The FECFILE Electronic Filing Software Version 6.2.1.0 that we use does not aggregate these memo entry contributions with prior contributions from the contributor. The RPV, however, made use of its internal contributor records to screen contributions from joint fundraising to make sure they complied with the limits and prohibitions of federal law (including a review to ensure that a contributor's aggregate year-to-date contributions to the RPV did not exceed federal contribution limits for that contributor to the RPV).

Item 6. Schedule F has been amended to reflect the proper office sought for James S. Gilmore III, the federal candidate supported - Senate.

Item 7. The following Schedule B, Line 30(b) disbursements have been amended to clarify description and disclose candidate:

Majority Strategies on 10/7/2008; Prime Signs on 10/15/2008; Postmaster on 10/15/2008; Printing Express on 10/14/2008; Stoneridge Group on 10/7/2008 and 10/15/2008.

These disbursements for signs, door hangers, palm cards, bumper stickers, postage for mailers and campaign mailers represent volunteer activity that meets the definition of Exempt Party Activity as set forth in 11 CFR 100.87 and 100.147.

Note: I initially tried to prepare this response as a Text Record at end of the 12 Day Pre-General Report, but there seems to be a limit on the size of the response.
